

Sena BAVI

December 11th, 2020

aristideoscar@yahoo.fr

to

8154 S Clyde ave

Honorables Judge Andrea WOOD

Chicago, IL 60617

Magistrate Judge Sheila M. FINNEGAN

(1:cv-20-6507)

Civil lawsuit against Two CPD Officers, Superior and the City of Chicago

121 N La Salle Street

Chicago, IL 60602

RECEIVED
MO
12/11/2020
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Complaint for:

- **Profiled, stop, target based on race, racial discrimination, retaliation, issuance of false citation based on head and race intentionally (selective enforcement);**
- **Abus of power, abus of process, malicious prosecution, retaliation, moral harassment, economic harassment;**
- **Intentional Public Health endangerment (terrorism) by City officials include police officers;**
- **Intentional aggravation of Disabled health by humiliation, threat, intimidation, severe emotional distress.**

Subject: Exhibits (Tickets primary details attached below)

Motion for summary judgement.

Dear Honorables,

I respectfully come to submit to you the City of Chicago Ticket – Primary Detail obtained on december 7, 2020 at the hearing for your appreciation as an exhibit.

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FILED
12/15/2020
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

The different police officers ID number (4855 and 18194) on the primary detail attached below with different location and time show clearly the intentional malicious prosecution or conspiracy to cover a misconduct by giving a violation ticket in night around 00:21 AM when there are not economic activities, when the street is clear, strange thing these same police officers from the same police district leave people parked in the same location for minutes during daylight when the street is busy and the economic activity is in full swing (i attached the evidence to my lawsuit as exhibit). They choose this option because after their long conversation and arrest threat, i hear them say this guy doesnt have anything on record so the only way for them is to give me an improper citation (i have evidence that my car has plate at this moment). This evidence confirm the fact that they issue me an improper citation also by retaliation because i forced them to wear their mask (see their body camera footage).

My infection with Covid 19 after testing positif while in Emergency room on november 13, 2020 shows how much they put not only my health but also the public health in danger by non wearing their mask while approaching me in my car, being a main vector of transmission of the virus. This act comparable as terrorism support the abuse of power allegation and intentional Public health endangerment by City Officials.

Considering that the City of Chicago and his Police Officers who are the guarantor of public order have violate their own law while approaching me in my car in the night of october 15, 2020, I endorse them the responsibility of my Covid 19 infection but also the infection of Chicago resident who got stopped by City of Chicago Police Officers and was later tested positif for Covid 19. For this and for the contours of this new disease that Reseachers are still trying to understand the possible mutation and the stress, I seek compensatory damage and punitive damage on behalf of all Chicago resident.

A

“Under the 5th and 14th Amendment’s rights of Due Process and Equal Protection, Public health regulations used to impose such conditions can’t be arbitrary, oppressive and unreasonable”.

The City primary ticket detail which show that i should receive a first notice on october 31st, 2020 and i didn’t receive it until i made the request by my self on november 03rd, 2020 and finally receive it on november 05, 2020 with the detail of location, time after filing my lawsuit on november 02nd, 2020 is material evidence of City of Chicago abuse of process in violation notice notification management for what intention only City Officials can give the answer to the Jury.

Honorables, the City hearing request after false ticket or improper citation based on race, the request of notice violation by City failure to notificate need the displacement of the Car owner, the payment of trip, possible parking fees, a long queue in the City Department of finance hall resulting not only in physical energy loss but also the loss of money, time (time is money) and the mental stress factor. This is proof of moral and economic harrassment which has negative impact on the economic health of the already disadvantaged social layers (because most of black driver stopped in racial profiling, target are Uber driver or food delivery man like me) . The City of Chicago Police Officer should be trained adequately (Police Officer involve in racial profiling and lie to cover the misconduct should be fired).

Based on this fact, we can say that the City of Chicago through his Police Officers in biased ticket issuance system based “ on the head of each customer” contributes to the rooting of social inequality, kind of discrimination which goes against the constitution which promises equal opportunity and treatment.

1

This voluntary or involuntary treatment to be qualified by the jury may be the source of a time delay bomb because it can create social conflicts in the future (protest march with its potential damage) slowing the development of our great City and consequently of our wonderful Country by ripple effect. This racial intentional inequality and tentative of cover up by issuing false ticket can increase the risk of suicide depending on the level of the invisible wound or injury due to intentional humiliation and arrest threat when you are alone in front of multiple Police Officer without witness in night like me. To prevent this, I ask for the higher punishment.

Honorables, based on my multiple material evidence, i ask you humbly to proceed to the summary judgement after defendands answer the complaint and submit their material evidence include three (3) body cameras footage and the pictures of my car without plate.

Sincerely yours.


Sena BAVI

US Army Disabled Veteran,

Legal immigrant followed, stopped and questioned by Chicago Police Officer in the night about why i was looking at them like that in my car and what i was doing in the night without any legal and valable reason, this without wearing mask and without safety distance.

Attachement: Four (04).

Ticket - Primary Detail

Issuance

Ticket: 0071757653
 Issued: 10-15-2020 00:21
 Officer ID: 4855
 Location: 7140 S WABASH AVE
 Rpt. District: 001
 Meter:

Vehicle

Plate/State: BU74699 / IL
 Plate Type: PAS
 Expiration: 11-2021
 Make: HYUN
 Color:
 Alt. Identifier: KMHCT4AE3CU095507
 Alt. Identifier Type: VIN
 Corp Nbr/Type: /

Payment

Tot Fines/Pen/Fees: \$100.00
 Fines/Pen+Fees: \$100.00
 Total Pymts/Adj: \$0.00 / \$0.00
Amount Due: \$100.00

Email Notification

Email Type:
 Email Last Sent:

Owner

Ownr/Resp Prty: BAVI
 First/MI: SENA A
 DLN/State: /
 Second Owner:
 First/MI:
 DLN/State: /
 Address: 8154 S CLYDE AVE
 City/State: CHICAGO / IL
 Zip: 60617-1115
 Lessor:

Control

Queue/Date: Court / 11-11-2020
 Notice Number: 5229114280
 Last Notice Date: 11-05-2020
 Notice Type: Violation
 Notice Date: 10-31-2020
 Next Notice Type: Determination
 Next Notice Date: 11-26-2020
 Contest Queue: In-Person
 Hearing Sched/Disp: 12-07-2020 / 12-11-2020
 Disposition Reason:

(Notice receive after request on 11/03)
I didn't receive any notice on this date (false)

Violation

Number	Description	VIOL	FINL
0964110A1	DOUBLE PARKING/STANDING NON-CENTRAL BUSINESS DISTR	\$100	\$200

Viewed By:

View On	User Id	Name
12-07-2020 10:26:16	ihaddad	Issa Haddad
11-06-2020 15:24:26	lcornell	Lynette Cornell
11-03-2020 12:29:43	lcornell	Lynette Cornell

Day I went to the hearing
Day I requested the notice after
filing my lawsuit on 11/02
(location: 2006 East 95th street)

2m 1

Ticket - Primary Detail

Issuance

Ticket: 0071754924
 Issued: 10-15-2020 00:50
 Officer ID: 18194
 Location: 1140 S WABASH AVE
 Rpt. District: 001
 Meter: 223

Payment

Tot Fines/Pen/Fees: \$150.00
 Fines/Pen+Fees: \$150.00
 Total Pymts/Adj: \$0.00 / \$0.00
Amount Due: \$150.00

Vehicle

Plate/State: BU74699 / IL
 Plate Type: PAS
 Expiration: 11-2021
 Make: HYUN
 Color:
 Alt. Identifier: KMHCT4AE3CU095507
 Alt. Identifier Type: VIN
 Corp Nbr/Type: /

Email Notification

Email Type:
 Email Last Sent:

Owner

Ownr/Resp Prty: BAVI
 First/MI: SENA A
 DLN/State: /
 Second Owner:
 First/MI:
 DLN/State: /
 Address: 8154 S CLYDE AVE
 City/State: CHICAGO / IL
 Zip: 60617-1115
 Lessor:

Control

Queue/Date: Court / 11-11-2020
 Notice Number: 5229114280
 Last Notice Date: 11-05-2020
 Notice Type: Violation
 Notice Date: 10-31-2020
 Next Notice Type: Determination
 Next Notice Date: 11-26-2020
 Contest Queue: In-Person
 Hearing Sched/Disp: 12-07-2020 / 12-11-2020
 Disposition Reason:

Violation

Number	Description	VIOL	FINL
0940060	PARK/STAND ON BICYCLE PATH	\$150	\$300

Viewed By:

View On	User Id	Name
12-07-2020 10:25:56	ihaddad	Issa Haddad
11-06-2020 15:23:59	lcornell	Lynette Cornell
11-03-2020 12:28:35	lcornell	Lynette Cornell

Rm 1

Ticket - Primary Detail

Issuance

Ticket: 0071754925
Issued: 10-15-2020 00:51
Officer ID: 18194
Location: 1140 S WABASH AVE
Rpt. District: 001
Meter:

Vehicle

Plate/State: BU74699 / IL
Plate Type: PAS
Expiration: 11-2021
Make: HYUN
Color:
Alt. Identifier: KMHCT4AE3CU095507
Alt. Identifier Type: VIN
Corp Nbr/Type: /

Payment

Tot Fines/Pen/Fees: \$60.00
Fines/Pen+Fees: \$60.00
Total Pymts/Adj: \$0.00 / \$0.00
Amount Due: \$60.00

Email Notification

Email Type:
Email Last Sent:

Owner

Ownr/Resp Prty: BAVI
First/MI: SENA A
DLN/State: /
Second Owner:
First/MI:
DLN/State: /
Address: 8154 S CLYDE AVE
City/State: CHICAGO / IL
Zip: 60617-1115
Lessor:

Control

Queue/Date: Court / 11-11-2020
Notice Number: 5229114280
Last Notice Date: 11-05-2020
Notice Type: Violation
Notice Date: 10-31-2020
Next Notice Type: Determination
Next Notice Date: 11-26-2020
Contest Queue: In-Person
Hearing Sched/Disp: 12-07-2020 / 12-11-2020
Disposition Reason:

Violation

Number	Description	VIOL	FINL
0976160A	MISSING/NONCOMPLIANT FRONT AND/OR REAR PLATE	\$60	\$120

Viewed By:

View On	User Id	Name
12-07-2020 10:25:30	ihaddad	Issa Haddad
11-06-2020 15:23:30	lcornell	Lynette Cornell
11-03-2020 12:27:48	lcornell	Lynette Cornell

RECEIVED

IN THE CITY OF CHICAGO, ILLINOIS
DEPARTMENT OF ADMINISTRATIVE HEARINGS

1:20-CV-650

12/7/2020
CITY OF CHICAGO, a Municipal Corporation,
THOMAS G. BRENNAN, District Court
CLERK, U.S. DISTRICT COURT
V.

Judge: Andrea R. Woolf

Magistrate: Judge Sheila
D. FINNEGAN

Ticket: 0071757653

Plate: IL PAS BU74699

BAVI, SENA A

8154 S CLYDE AVE
CHICAGO, IL 606171115
Respondent.

FINDINGS, DECISIONS & ORDERS

On 10-15-2020 you were issued a violation for:

0964110A1 DOUBLE PARKING/STANDING NON-CENTRAL BUSINESS DISTR

As a defense to this ticket you have asserted that the violation is factually inconsistent. An Administrative Law Judge has reviewed all the evidence submitted, either in person or by mail, by the City of Chicago and you.

It is the finding of the Administrative Law Judge that the information submitted supports a determination that the violation did not occur.

Consequently, you are not responsible for the fine.

Additional Findings:

ENTERED: Bernadette Freeman
Administrative Law Judge

090
#

12-07-2020
Date

You may appeal this order to the Circuit Court of Cook County (Daley Center, 6th Floor) within 35 days of the order date by filing a civil law suit against the City of Chicago and by paying the appropriate state mandated filing fee.

IN THE CITY OF CHICAGO, ILLINOIS
DEPARTMENT OF ADMINISTRATIVE HEARINGS

CITY OF CHICAGO, a Municipal Corporation,
Petitioner.
v.

BAVI, SENA A

Ticket: 0071754924

8154 S CLYDE AVE
CHICAGO, IL 606171115
Respondent.

Plate: IL PAS BU74699

FINDINGS, DECISIONS & ORDERS

On 10-15-2020 you were issued a violation for:

0940060 PARK/STAND ON BICYCLE PATH

As a defense to this ticket you have asserted that the violation is factually inconsistent. An Administrative Law Judge has reviewed all the evidence submitted, either in person or by mail, by the City of Chicago and you.

It is the finding of the Administrative Law Judge that the information submitted supports a determination that the violation did not occur.

Consequently, you are not responsible for the fine.

Additional Findings:

ENTERED: Bernadette Freeman
Administrative Law Judge

090
#

12-07-2020
Date

You may appeal this order to the Circuit Court of Cook County (Daley Center, 6th Floor) within 35 days of the order date by filing a civil law suit against the City of Chicago and by paying the appropriate state mandated filing fee.

IN THE CITY OF CHICAGO, ILLINOIS
DEPARTMENT OF ADMINISTRATIVE HEARINGS

CITY OF CHICAGO, a Municipal Corporation,
Petitioner.
v.

BAVI, SENA A

Ticket: 0071754925

8154 S CLYDE AVE
CHICAGO, IL 606171115
Respondent.

Plate: IL PAS BU74699

FINDINGS, DECISIONS & ORDERS

On 10-15-2020 you were issued a violation for:

0976160A MISSING/NONCOMPLIANT FRONT AND/OR REAR PLATE

As a defense to this ticket you have asserted that the violation is factually inconsistent. An Administrative Law Judge has reviewed all the evidence submitted, either in person or by mail, by the City of Chicago and you.

It is the finding of the Administrative Law Judge that the information submitted supports a determination that the violation did not occur.

Consequently, you are not responsible for the fine.

Additional Findings:

ENTERED: Bernadette Freeman
Administrative Law Judge

090
#

12-07-2020
Date

You may appeal this order to the Circuit Court of Cook County (Daley Center, 6th Floor) within 35 days of the order date by filing a civil law suit against the City of Chicago and by paying the appropriate state mandated filing fee.



NOTICE OF VIOLATION

City of Chicago Department of Finance

To Pay Your Ticket or Check the Status of Your Hearing Request Visit

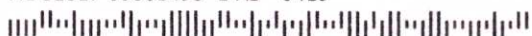
www.chicago.gov/finance

312-744-7275 312-744-7277 (TTY - For Hearing Impaired)

0000

Notice Date: 11/05/20
Notice Number: 5229114280

MDG2017 00001493 1 AB 0419



BAVI, SENA A
8154 S CLYDE AVE
CHICAGO, IL 60617-1115



Need More Time To Pay?

Go to www.chicago.gov/finance
to enroll in an Early Payment Plan.

YOU MUST PAY OR CONTEST BY ↓

VIOLATION(S)

TICKET NUMBER(S)	PLATE/STATE/TYPE/VEHICLE MAKE	LOCATION DATE & TIME	VIOLATION CODE(S) AND DESCRIPTION(S)	FINE AMOUNT(S)	TOTAL AMOUNT DUE	PAY OR CONTEST BY DATE PER TICKET
0071754925	BU74699 IL PAS 1121 HYUN	1140 S WABASH AVE 10/15/20 00:51	0976160A MISSING/NONCOMPLIANT FRONT AND/OR REAR PLATE	\$60	\$60.00	11/26/20
0071754924	BU74699 IL PAS 1121 HYUN	1140 S WABASH AVE 10/15/20 00:50	0940060 PARK/STAND ON BICYCLE PATH	\$150	\$150.00	11/26/20
0071757653	BU74699 IL PAS 1121 HYUN	7140 S WABASH AVE 10/15/20 00:21	0964110A1 DOUBLE PARKING/STANDING NON-CENTRAL BUSINESS DISTR	\$100	\$100.00	11/26/20

TOTAL FOR ALL PAGES **\$310.00**

PLEASE SEE REVERSE SIDE FOR IMPORTANT INFORMATION, INCLUDING YOUR HEARING AND PAYMENT OPTIONS.

VIO 01 01 001493 001494 P

Notice of Violation Stub

1 OF 1

BAVI, SENA A
8154 S CLYDE AVE
CHICAGO, IL 60617-1115

Notice Date: 11/05/20

Notice Number: 5229114280

Please fill in the PAY ALL circle if you would like to pay all of the listed tickets OR

PAY ALL → ☐

You may choose other options by filling in the circles below for each ticket:

TOTAL AMOUNT DUE
For Violations Listed On This Notice

TICKET#	PAYMENT ENCLOSURED	CONTEST BY MAIL	IN-PERSON HEARING	TICKET#	PAYMENT ENCLOSURED	CONTEST BY MAIL	IN-PERSON HEARING
0071754925	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	0071754924	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
0071757653	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

\$310.00

REFLECTS PAYMENTS AS OF:

10/31/20

TO ENSURE PROPER CREDIT, PLEASE RETURN ALL STUBS WITH YOUR PAYMENT

Please enclose your check or money order made payable to the CITY OF CHICAGO.



NOTIFICATION OF IN-PERSON HEARING

City of Chicago Department of Finance
To Pay Your Ticket or Check the Status of Your Hearing Request Visit
www.chicago.gov/finance

312-744-7275 312-744-7277 (TTY - For Hearing Impaired)

MDG2017 00000656 1 SP 050 0



BAVI, SENA A
8154 S CLYDE AVE
CHICAGO, IL 60617-1115

Notice Date: 11/16/20

VIOLATION(S)

TICKET NUMBER(S)	PLATE/STATE/TYPE/ VEHICLE MAKE	LOCATION DATE & TIME	VIOLATION CODE(S) AND DESCRIPTION(S)	FINE AMOUNT(S)	HEARING DATE OPTIONS
0071754924	BU74699 IL PAS	1140 S WABASH AVE	0940060	\$150.00	12/07/20 THROUGH 12/11/20
	11/21 HYUN	10/15/20 00:50	PARK/STAND ON BICYCLE PATH		
0071754925	BU74699 IL PAS	1140 S WABASH AVE	0976160A	\$60.00	12/07/20 THROUGH 12/11/20
	11/21 HYUN	10/15/20 00:51	MISSING/NONCOMPLIANT FRONT AND/OR REAR PLATE		
0071757653	BU74699 IL PAS	7140 S WABASH AVE	0964110A1	\$100.00	12/07/20 THROUGH 12/11/20
	11/21 HYUN	10/15/20 00:21	DOUBLE PARKING/STANDING NON-CENTRAL BUSINESS DISTR		

**

Your hearing date options are listed above. You may appear at any of the hearing locations listed below during this time period, excluding City holidays.

Do not pay tickets you are seeking to contest unless you wish to waive your right to the hearing you requested. The administrative law judge's decision at your hearing is final, so please bring all witnesses or evidence needed to support your defense to the hearing. Evidence can include, but is not limited to, photographs, affidavits, your state vehicle registration, or official police vehicle theft and/or recovery reports.

HEARING LOCATIONS

South

2006 E. 95th St.
Hearing Hours:
8AM-4PM (M-F)

North

4445 N. Pulaski Rd.
Hearing Hours:
8AM-4PM (M-F)

Central Hearing Facility

400 W. Superior, 1st Floor
Boot Hearings Only:
8:30AM-4PM (M-F)
9AM-3PM (SAT)